

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PRICILLA SARAF,	:	
	:	
Plaintiff,	:	Civil Action No. 16-cv-01425 (VSB)
	:	
v.	:	
	:	
WEST PUBLISHING CORPORATION	:	
d/b/a THOMSON REUTERS,	:	
	:	
Defendant.	:	
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**DECLARATION OF TANVIR H. RAHMAN  
IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

I, Tanvir H. Rahman, pursuant to 28 U.S.C. §1746, declare and state as follows:

1. I am an attorney at the law firm Wigdor LLP, attorneys for Plaintiff Pricilla Saraf. I have personal knowledge of the facts set forth herein and submit this declaration in opposition to Defendant's motion for summary judgment.
2. Attached hereto as **Exhibit 1** is a true and accurate copy of the February 9, 2017 and February 16, 2017 Deposition Transcripts of Pricilla Saraf.
3. Attached hereto as **Exhibit 2** is a true and accurate copy of the February 28, 2017 Deposition Transcript of Rob Alston.
4. Attached hereto as **Exhibit 3** is a true and accurate copy of the March 6, 2017 Deposition Transcript of Colleen Doherty.
5. Attached hereto as **Exhibit 4** is a true and accurate copy of the March 15, 2017 Deposition Transcript of Robert G. Genthner.
6. Attached hereto as **Exhibit 5** is a true and accurate copy of the March 24, 2017 Deposition Transcript of Tommy Williams.

7. Attached hereto as **Exhibit 6** is a true and accurate copy of the April 27, 2017 Deposition Transcript of Jean Marie Brahmer.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of an affidavit signed by Pricilla Saraf, dated March 5, 2018.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of a screenshot of an October 20, 2015 text message conversation between Pricilla Saraf and Arzo Behar, Bates-stamped PL 584.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of Thomson Reuters Expert Witness Services (“TREWS”) New Client Searches by Date data from 1/1/2015 to 5/31/15, Bates-stamped PL 210 – PL 212.

11. Attached hereto as **Exhibit 10** is a true and accurate copy of a February 12, 2015 email exchange between Robert Genthner, Pricilla Saraf and others, Bates-stamped PL 274 – PL 275.

12. Attached hereto as **Exhibit 11** is a true and accurate copy of a March 24, 2015 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped PL 281.

13. Attached hereto as **Exhibit 12** is a true and accurate copy of an April 13, 2015 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped PL 288 – PL 290.

14. Attached hereto as **Exhibit 13** is a true and accurate copy of a May 13, 2015 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped PL 295.

15. Attached hereto as **Exhibit 14** is a true and accurate copy of a June 9-10, 2015 email exchange between Tommy Williams and Pricilla Saraf, Bates-stamped PL 300 – PL 301.

16. Attached hereto as **Exhibit 15** is a true and accurate copy of a July 24, 2015 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped PL 317.

17. Attached hereto as **Exhibit 16** is a true and accurate copy of a July 30, 2015 email exchange between Heidi Cohen, Pricilla Saraf and others, Bates-stamped PL 320 – PL 321.

18. Attached hereto as **Exhibit 17** is a true and accurate copy of a September 17, 2015 email exchange between Robert Genthner, Pricilla Saraf and others, Bates-stamped PL 337 – PL 339.

19. Attached hereto as **Exhibit 18** is a true and accurate copy of an October 14, 2016 email exchange between Shannon Kelly and Tommy Williams, Bates-stamped PL 585 – PL 587.

20. Attached hereto as **Exhibit 19** is a true and accurate copy of an Affidavit of Shannon Kelly, dated April 28, 2017, Bates-stamped PL 611 – PL 613.

21. Attached hereto as **Exhibit 20** is a true and accurate copy of a July 13-14, 2015 email exchange between Katie Weatherly, Robert Genthner and others, Bates-stamped TR\_SARAF0000207 – TR\_SARAF0000209.

22. Attached hereto as **Exhibit 21** is a true and accurate copy of September 9-10, 2015 email exchange between Robert Genthner, Katie Weatherly and others, Bates-stamped TR\_SARAF0000218 – TR\_SARAF0000219.

23. Attached hereto as **Exhibit 22** is a true and accurate copy of an October 16, 2015 email exchange between Robert Alston, Robert Genthner and others, Bates-stamped TR\_SARAF0000234.

24. Attached hereto as **Exhibit 23** is a true and accurate copy of an October 22-26, 2015 email exchange between Colleen Doherty and Pricilla Saraf, Bates-stamped TR\_SARAF0000289.

25. Attached hereto as **Exhibit 24** is a true and accurate copy of an October 19, 2015 email exchange between Robert Genthner and Robert Alston, Bates-stamped TR\_SARAF0000320 - TR\_SARAF0000321.

26. Attached hereto as **Exhibit 25** is a true and accurate copy of an October 16, 2015 email exchange between Robert Genthner and Robert Alston, with attached territory maps, Bates-stamped TR\_SARAF0000322 – TR\_SARAF0000326.

27. Attached hereto as **Exhibit 26** is a true and accurate copy of a June 30, 2015 email exchange between Robert Genthner and Robert Alston, with subject line “Q2 2015 Update to Sales Team Talent Evaluation,” with attachment, Bates-stamped TR\_SARAF0000338 – TR\_SARAF0000339.

28. Attached hereto as **Exhibit 27** is a true and accurate copy of an October 16, 2015 email exchange between Robert Alston and Tommy Williams, with attached territory maps, Bates-stamped TR\_SARAF0000351 – TR\_SARAF0000355.

29. Attached hereto as **Exhibit 28** is a true and accurate copy of the Business Development Executive Thomson Reuters Expert Witness Services Job Description, Bates-stamped TR\_SARAF0000617.

30. Attached hereto as **Exhibit 29** is a true and accurate copy of the TREWS 2015 Revenue Plan tab from a native document produced in this matter, Bates-stamped TR\_SARAF0000398.

31. Attached hereto as **Exhibit 30** is a true and accurate copy of a March 31, 2015 email exchange between Pricilla Saraf and Tommy Williams, Bates-stamped TR\_SARAF0000658.

32. Attached hereto as **Exhibit 31** is a true and accurate copy of the Defendant's "Family and Medical Leave" policy, Bates-stamped TR\_SARAF0000885 – TR\_SARAF0000892.

33. Attached hereto as **Exhibit 32** is a true and accurate copy of an August 19, 2015 email exchange between Tommy Williams and Pricilla Saraf, Bates-stamped TR\_SARAF0000902 – TR\_SARAF0000903.

34. Attached hereto as **Exhibit 33** is a true and accurate copy of Pricilla Saraf's 2014 Year End Performance Review, Bates-stamped TR\_SARAF0000948 – TR\_SARAF0000953.

35. Attached hereto as **Exhibit 34** is a true and accurate copy of a February 6, 2015 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped TR\_SARAF0001188.

36. Attached hereto as **Exhibit 35** is a true and accurate copy of a January 7, 2015 email exchange between Robert Genthner, Pricilla Saraf and others, Bates-stamped TR\_SARAF0001312 – TR\_SARAF0001313.

37. Attached hereto as **Exhibit 36** is a true and accurate copy of a March 20, 2015 email exchange between Stacy Jacobson, Pricilla Saraf and others, Bates-stamped TR\_SARAF0001338 – TR\_SARAF0001339.

38. Attached hereto as **Exhibit 37** is a true and accurate copy of a July 2, 2014 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped TR\_SARAF0001352.

39. Attached hereto as **Exhibit 38** is a true and accurate copy of a July 31, 2015 email exchange between Robert Genthner, Pricilla Saraf and others, Bates-stamped TR\_SARAF0001365.

40. Attached hereto as **Exhibit 39** is a true and accurate copy of a June 15, 2015 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped TR\_SARAF0001378 – TR\_SARAF0001379.

41. Attached hereto as **Exhibit 40** is a true and accurate copy of a November 18, 2014 email exchange between Robert Genthner, Pricilla Saraf and Regina Verret Foster, Bates-stamped TR\_SARAF0001476 – TR\_SARAF0001478.

42. Attached hereto as **Exhibit 41** is a true and accurate copy of an October 13, 2015 email exchange between Robert Alston and Tommy Williams, excluding attachments, Bates-stamped TR\_SARAF002912 – TR\_SARAF002913.

43. Attached hereto as **Exhibit 42** is a true and accurate copy of a Post-it note, Bates-stamped TR\_SARAF002934.

44. Attached hereto as **Exhibit 43** is a true and accurate copy of spreadsheets depicting TREWS Sales Activity Reports, Bates-stamped TR\_SARAF002946 – TR\_SARAF002952. Based on representations from Defendant's counsel, TR\_SARAF002946 is Karen Hurley's "Activity Report," and TR\_SARAF002952 is Pricilla Saraf's "Activity Report."

45. Attached hereto as **Exhibit 44** is a true and accurate copy of a February 26, 2015 email exchange between Karen Hurley and Robert Genthner, Bates-stamped TR\_SARAF002953 – TR\_SARAF002955.

46. Attached hereto as **Exhibit 45** is a true and accurate copy of a July 29, 2015 email exchange between Pricilla Saraf and Robert Genthner, Bates-stamped TR\_SARAF002958 – TR\_SARAF002960.

47. Attached hereto as **Exhibit 46** is a true and accurate copy of a September 5, 2014 email exchange between Jane Zimmerman, Tommy Williams and Colleen Doherty, Bates-stamped TR\_SARAF003057.

48. Attached hereto as **Exhibit 47** is a true and accurate copy of an October 29-30, 2015 email exchange between Dan Rubin, Robert Genthner and others, Bates-stamped TR\_SARAF0000121 – TR\_SARAF0000123.

49. Attached hereto as **Exhibit 48** is a true and accurate copy of an October 29, 2015 email exchange between Robert Genthner and Robert Alston, Bates-stamped TR\_SARAF0000294 – TR\_SARAF0000296.

50. Attached hereto as **Exhibit 49** is a true and accurate copy of a September 29, 2015 email exchange between Natasha Jaroscak, Robert Alston and others, Bates-stamped TR\_SARAF0000309 – TR\_SARAF0000311.

51. Attached hereto as **Exhibit 50** is a true and accurate copy of an October 26-27, 2015 email exchange between Robert Alston, Colleen Doherty and others, Bates-stamped TR\_SARAF0000342 – TR\_SARAF0000343.

52. Attached hereto as **Exhibit 51** is a true and accurate copy of a June 17-23, 2015 email exchange between Robert Alston, Stacy Jacobson and others, Bates-stamped TR\_SARAF0000376 – TR\_SARAF0000380.

53. Attached hereto as **Exhibit 52** is a true and accurate copy of a November 3, 2015 email exchange between Rachel Laing, Robert Genthner and others, Bates-stamped TR\_SARAF0000384 – TR\_SARAF0000386.

54. Attached hereto as **Exhibit 53** is a true and accurate copy of an October 21, 2015 email exchange between Robert Alston and Colleen Doherty, with attachments, Bates-stamped TR\_SARAF0000412 – TR\_SARAF0000413.

55. Attached hereto as **Exhibit 54** is a true and accurate copy of an October 20, 2015 email exchange between Robert Genthner and Pricilla Saraf, Bates-stamped TR\_SARAF0000418 – TR\_SARAF0000419.

56. Attached hereto as **Exhibit 55** is a true and accurate copy of a June 15, 2015 email exchange between Robert Genthner and Pricilla Saraf, with attachments, Bates-stamped TR\_SARAF0000432 – TR\_SARAF0000433.

57. Attached hereto as **Exhibit 56** is a true and accurate copy of a March 26, 2015 email exchange between Tommy Williams, Pricilla Saraf and others, Bates-stamped TR\_SARAF0000895 – TR\_SARAF0000897.

58. Attached hereto as **Exhibit 57** is a true and accurate copy of Karen Hurley's 2014 Year End Performance Review, Bates-stamped TR\_SARAF0000937 – TR\_SARAF0000941.

59. Attached hereto as **Exhibit 58** is a true and accurate copy of a Karen Hurley's 2015 Year End Performance Review, Bates-stamped TR\_SARAF0000942 – TR\_SARAF0000945.

60. Attached hereto as **Exhibit 59** is a true and accurate copy of an October 9-14, 2015 email exchange between Robert Genthner, Jen Sander and others, Bates-stamped TR\_SARAF0000958 – TR\_SARAF0000960.

61. Attached hereto as **Exhibit 60** is a true and accurate copy of a June 19, 2015 email exchange between Robert Genthner, Robert Alston and Karen Hurley, Bates-stamped TR\_SARAF0001013 – TR\_SARAF0001016.



62. Attached hereto as **Exhibit 61** is a true and accurate copy of a May 29, 2015 email exchange between Robert Alston and Robert Genthner, Bates-stamped TR\_SARAF0001017.

63. Attached hereto as **Exhibit 62** is a true and accurate copy of a June 24-25, 2015 email exchange between Robert Genthner and Colleen Doherty, Bates-stamped TR\_SARAF0001042 – TR\_SARAF0001043.

64. Attached hereto as **Exhibit 63** is a true and accurate copy of a January 26-27, 2015 email exchange between Robert Genthner, Pricilla Saraf and others, Bates-stamped TR\_SARAF0001276 – TR\_SARAF0001278.

65. Attached hereto as **Exhibit 64** is a true and accurate copy of a September 8, 2014 email exchange between [redacted named] and Pricilla Saraf, Bates-stamped TR\_SARAF0001286 – TR\_SARAF0001288.

66. Attached hereto as **Exhibit 65** is a true and accurate copy of an August 19-20, 2015 email exchange between Carolyn Klos, Robert Genthner and others, Bates-stamped TR\_SARAF0001327 – TR\_SARAF0001329.

67. Attached hereto as **Exhibit 66** is a true and accurate copy of a map entitled “TREWS BDE Contacts (geographic responsibilities),” Bates-stamped TR\_SARAF0002761.

68. Attached hereto as **Exhibit 67** is a true and accurate copy of Defendant’s “Guidelines for Disciplinary Action, Performance Improvement and Termination” policy, Bates-stamped TR\_SARAF0002885 – TR\_SARAF0002891.

69. Attached hereto as **Exhibit 68** is a true and accurate copy of an October 18, 2015 email exchange between Robert Alston and Tommy Williams, with attachments, Bates-stamped TR\_SARAF0002907 – TR\_SARAF0002910.

70. Attached hereto as **Exhibit 69** is a true and accurate copy of Colleen Doherty's TREWS BDE Employee Territory Assessment, Bates-stamped TR\_SARAF0002911.

71. Attached hereto as **Exhibit 70** is a true and accurate copy of an October 19, 2015 email exchange between Robert Alston and Colleen Doherty, Bates-stamped TR\_SARAF000290.

72. Attached hereto as **Exhibit 71** is a true and accurate copy of Michelle Cipolla's Equal Employment Opportunity Commission Charge of Discrimination, Bates-stamped TR\_SARAF0002963 – TR\_SARAF0002964.

73. Attached hereto as **Exhibit 72** is a true and accurate copy of an August 8-11, 2014 email exchange between Ann Ross, Colleen Doherty and others, Bates-stamped TR\_SARAF0003008 – TR\_SARAF0003009.

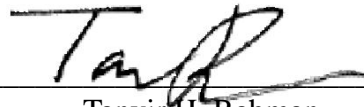
74. Attached hereto as **Exhibit 73** is a true and accurate copy of an August 18, 2014 email exchange between Ann Ross and Colleen Doherty, Bates-stamped TR\_SARAF0003016.

75. Attached hereto as **Exhibit 74** is a true and accurate copy of a September 9-11, 2014 email exchange between Ann Ross and Michelle Cipolla, forwarded to Colleen Doherty, Bates-stamped TR\_SARAF0003024 – TR\_SARAF0003025.

76. Attached hereto as **Exhibit 75** is a true and accurate copy of a September 16, 2014 email exchange between Ann Ross, Tommy Williams and Colleen Doherty, Bates-stamped TR\_SARAF0003032.

77. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: March 5, 2018  
New York, New York

  
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Tanvir H. Rahman